## THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Nicholas Zindel Epps, : Chapter 13

Debtor : No. : 21-10317-mdc

## **CERTIFICATE OF NO RESPONSE**

The undersigned does hereby certify:

- 1. That I am the attorney for Nicholas Zindel Epps, Debtor in the above-captioned matter.
- 2. That a copy of the motion to avoid the inchoate judicial lien of JMMMPC Company, along with notice of motion filed with this Court on April 21, 2021 was served upon parties in interest on April 21, 2021.
- 3. A Certificate of Service was filed with this Court on April 21, 2021, declaring service to the parties in interest.
- 4. A response deadline was set for May 12, 2021.
- 5. No response to said Motion has been received as of May 17, 2021.

Respectfully Submitted,

ROSS, QUINN & PLOPPERT, P.C

BY: /s/ Joseph Quinn

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Date: May 17, 2021 F: (610) 323 - 6081 JQuinn@rqplaw.com